1 2 3 4	SCOTT A. SUGARMAN (No. 68277) SUGARMAN & CANNON 180 Montgomery St., Suite 2350 San Francisco, CA. 94104 Telephone: (415) 362-6252 Facsimile: (415) 362-6431		
5	Attorneys for Defendant DAVID COOPER		
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7			
8	IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA		
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11 12	UNITED STATES OF AMERICA,	No. CR 15-0058 CRB	
13	Plaintiff,	CTIDIH ATION AND [managed]	
14	v.	STIPULATION AND [proposed] ORDER TO CONTINUE	
15	DAVID COOPER,	STATUS/CHANGE OF PLEA	
16	Defendant.		
17	Mr. Cooper is presently set to appear before thi	s Court on December 16, 2015, at 12:00	
18	p.m. for a Status Conference or Change of Plea. The only codefendant in this action is presently		
19	participating in the Conviction Alternative Program.		
20			
21	Since the last court appearance, counsel for the parties have had detailed discussions		
22	regarding a possible resolution to the pending charges against Mr. Cooper. Mr. Cooper needs		
23	additional time to decide whether to enter a plea or request a trial date.		
24	The parties request and STIPULATE to continue the December 16, 2015 hearing for		
25	Status/Change of Plea from December 16, 2015 to January 13, 2016 at 2:00 p.m. for		
26	Status/Change of Plea.		
27	Status, Change of Fica.		
28			

STIPULATION AND [proposed] ORDER TO CONTINUE DECEMBER 16, 2015 HEARING No. 15-0058 CRB

Case 3:15-cr-00058-WHO Document 76 Filed 12/15/15 Page 2 of 2

1	Counsel for the defendant and the government further STIPULATE that time should be		
2	excluded between those dates for effective preparation of counsel and continuity of defense		
3	counsel. 18 U.S.C. § 3161(h)(7)(B)(iv). Furthermore, the parties agree that the ends of justice		
4	served by granting such a continuance outweigh the best interests of the public and the defendant		
5 6	in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).		
7	IT IS SO STIPULATED.		
8	DATED: December 11, 2015	 Lloyd Farnham	
9		Assistant United States Attorney	
10 11	DATED: December 11, 2015	/s/	
12	DATED. December 11, 2013	Scott A. Sugarman Attorney for David Cooper	
13	IT IS SO ORDERED.	Theories for Buvia Cooper	
14	DATE: 12/15/2015		
15		CHARLES R. BREYER UNITED STATES DISTRICT JUDGE	
16 17			